BEFORE THE PUBLIC SERVICE COM MISSION OF SOUTH CAROLINA

DOCKET NO. 2018-211-T

Kevin Marra, Complainant/Petitioner	PREFILED DIRECTTESTIMONY OF CAMERON BRIGHT
v.	
JMS Worldwide, LLC, Defendant/Respondent.	

- 1 Q. Please state your name, occupation, and business address.
- 2 A. My name is Cameron Bright, I am Regional Director of Operations of JMS Worldwide,
- 3 LLC ("JMS"). My business address is 2818-A Industrial Ave, North Charleston SC 29405
- 4 Q. What are your duties at JMS?
- 5 A. I schedule and supervise moving crews and serve as the company's contact with customers
- 6 during a move.
- 7 Q. Were you present on April 19, 2018 for JMS's move of Kevin and Marinés Marra's
- 8 belongings from an apartment at 515 Robert Daniel Drive on Daniel Island?
- 9 A. Yes.
- 10 Q. Who was present for the move?
- 11 A. I was there with a three man crew that packed and moved the Marras' belongings. Mrs.
- 12 Marra was also present.
- 13 Q. Were there circumstances that made the move difficult?
- 14 A. Yes. We were not able to park our truck in front of the Marras' apartment. The apartment
- manager made the crew move it across the parking lot so as to not block the exit of the apartment's

- 1 parking garage. The extra distance required to reach the truck extended the time it took to load
- 2 the Marras' belongings.
- 3 Q: Who prepared the bill of lading for the move?
- 4 A. I did.
- 5 Q. How did you go about preparing the bill of lading?
- 6 A. I added up the manhours spent packing and moving the truck, the charges for packing
- 7 materials, and our other tariffed charges. I also estimated that we would have 1 hour of travel time
- 8 and it would take our crew 5.5 hours to unpack the truck and store the goods in the warehouse.
- 9 Q. Did you present the bill of lading to the customer?
- 10 A. Yes. I gave it to Mrs. Marra and explained the charges. A copy of the bill of lading is
- attached as Exhibit CB-1 to my testimony.
- 12 Q. What did Mrs. Marra do after you presented the bill of lading to her?
- 13 A. I recall that Mrs. Marra wanted to consult her husband about which credit card she should
- use to pay. She took a picture of the bill of lading with her phone and sent it to him. They had a
- brief telephone conversation, and then she paid me.
- 16 Q. Did you prepare the inventory attached as Exhibit CB-2 to your testimony?
- 17 A. Yes, I did. It is an inventory of the Marras' goods that were moved to the warehouse.
- 18 Q. Did Mrs. Marra complain about the charges that day?
- 19 A. No.
- 20 Q. Did you speak with Mr. Marra that day?
- 21 A. Yes. I spoke with him by telephone and briefly explained the charges.
- 22 Q. How would you describe the tone of your conversation with Mr. Marra?
- 23 A. It was brief and cordial.

- 1 Q. What was the tone of your conversation with Mrs. Marra?
- 2 A. It was also cordial.
- 3 Q. Did you threaten or intimidate Mrs. Marra?
- 4 A. No.
- 5 Q. Were you present on May 8, 2018, when Mr. and Mrs. Marra's goods were
- 6 transferred to the Smooth Move company from JMS's warehouse?
- 7 A. Yes.
- 8 Q. What was required to transfer the goods to Smooth Move
- 9 A. The Marras' goods were in the back of our warehouse because we were led to believe they
- would be stored with JMS for an extended period of time. When Mr. Marra demanded the transfer
- in May, we had to move them out of the back of the warehouse, requiring us to rearrange other
- shipments that were in front of them.
- 13 Q. Did you compute the charge for transferring the goods from the warehouse?
- 14 A. Yes.
- 15 **Q.** How did you arrive at \$1,192?
- 16 A. It took four men eight hours to complete the job.
- 17 Q. Was this your last interaction with the Marras' belongings?
- 18 A. Yes.

EXHIBIT CB-1

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